

SUBMISSION to SENATE COMMITTEE for COMMONWEALTH FUNDING for  
MENTAL HEALTH SERVICES

I wish to express my concerns in relation to the Committee terms of reference (e)(i) *The two-tiered Medicare rebate system for Psychologists*

Clinical psychologists require a further two years of tertiary training than generalist psychologists as well as a different and rigorous system of Professional Development points in order to maintain their registration. It is not clinically useful to remove the differentiation between clinical and generalist psychologists. A clinical psychologist is qualified to undertake intervention in more serious mental health issues via their increased level of training. Intervention by psychologists without the required training in these areas presents an enormous risk to mental health consumers including, but not restricted to, an increased risk of suicide. For this reason the NSW Health department does not employ generalist psychologists in clinical roles. The Australian Registration Board for Health Practitioners likewise recognizes this distinction with generalist psychologists not allowed to advertise their services beyond their level of expertise.

If it were to remove the two-tiered rebate system for psychologists, the committee will mislead mental health service consumers into believing that there is no difference between the service provided generalist psychologists and clinical psychologists. It will also discourage psychologists from taking the clients with more complex presentations, as there is no reward in it, leaving the most needy consumers without a service. If the aim of the scheme is to improve access to mental health services for these consumers, removing the two-tiered rebate system will do just the opposite. It would also discourage psychologists from undertaking the further training to gain their clinical qualifications, a lengthy and sometimes expensive process, ultimately again reducing the access to appropriate services for those clients most in need.

In my opinion, the work of clinical psychologists involves complex expertise and considerable risk management and as such, deserves differential recognition by the funding structure.

Thank you for your time.

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Clinical Psychologist